

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Lolita Cheatham	)	
	)	
	)	Case No. 16-31848-KLP
	)	
	)	
	)	Chapter <u>13</u>
Debtor(s)	)	
10254 Brading Ln	)	
Midlothian, VA 23112	)	
	)	
Last four digits of Social Security No(s): <u>4617</u>	)	
	)	
	)	

**NOTICE OF MOTION (OR OBJECTION)**

Debtor(s) have filed papers with the court to Extend the Automatic Stay.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before May 9, 2016, you or your attorney must:

[ X] File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.  
8501 Mayland Dr., Ste 106  
Henrico, VA 23294

[ ] Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**

[X] Attend the hearing on the motion (or objection) scheduled to be held on May 11, 2016 at 10:00 a. m. at United States Bankruptcy Court, 701 East Broad Street, Crtrm 5100 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 4/25/2016

Signature, name, address, and telephone number of person giving notice:

/s/ Richard J. Oulton

Richard J. Oulton, Esq. VSB 29640

America Law Group, Inc.

8501 Mayland Dr., Ste 106

Henrico, VA 23294

Counsel for Lolita Cheatham

#### Certificate of Service

I hereby certify that I on April 25, 2016, I have mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

#### *Creditors*

**Bon Secours**

PO Box 28538

Henrico, VA 23228-0000

**Cavalry Investments LLC**

500 Summit Lake Dr. Ste 400

Valhalla, NY 10595-0000

**Cavalry Portfolio Services**

500 Summit Lake Drive, Ste 400

Valhalla, NY 10595-1340

**Central Credit/Penn Cr**

Attn: Bankruptcy

PO Box 988

Harrisburg, PA 17108-0000

**Check City**

PO Box 970183

Orem, UT 84097-0000

**Check City**

re: Bankruptcy

6001 West Broad Street

Richmond, VA 23230-0000

**CHECK CITY**

2729-B WEST BROAD ST.

RICHMOND, VA 23220

**CJW Medical Center**  
PO Box 13620  
Richmond, VA 23225-0000

**Convergent Outsourcing**  
10750 Hammerly Blvd #200  
Houston, TX 77043-0000

**Credit Acceptance**  
25505 W 12 Mile Rd, Ste 2300  
Southfield, MI 48034-0000

**Dominion Virginia Power**  
PO Box 26543  
Richmond, VA 23290-0001

**DriveTime Credit Co**  
attn: Bankruptcy  
PO Box 29018  
Phoenix, AZ 85038-0000

**Eastern Account System of Conn**  
PO Box 837  
Newtown, CT 06470-0000

**Enhanced Recovery Corporation**  
8014 Bayberry Rd  
Jacksonville, FL 32256-7412

**Extra Spce Storage**  
7000 Hull Street Rd  
Richmond, VA 23224-0000

**HCA Henrico Doctors Hospital**  
1602 Skipwith Road  
Henrico, VA 23229-0000

**Henrico Doctor's Hospital**  
PO Box 13620  
Richmond, VA 23225-8620

**International Collection Servi**  
c/o Jefferson Capital Systems  
PO Box 7999  
Saint Cloud, MN 56302-0000

**Jefferson Capital Systems**  
16 McLeland Rd  
Saint Cloud, MN 56303-0000

**MCV Associated Physicians**  
830 E Main St  
Suite 1900  
Richmond, VA 23219-0000

**National Credit Systems**  
PO Box 312125

Atlanta, GA 31131-2125

**Navy Federal Credit Union**  
PO Box 3000  
Merrifield, VA 22119-3000

**Parrish and LeBar, LLP**  
5 E Franklin St.  
Richmond, VA 23219-0000

**Resurgent Capital Services**  
PO Box 10587  
Greenville, SC 29603-0587

**Seventh Avenue**  
re: Bankruptcy Dep't  
112 7th Ave  
Monroe, WI 53566-1364

**Spinella, Owings & Shaia**  
8550 Mayland Dr, Ste 1  
Henrico, VA 23294-0000

**Sprint**  
Attn: Bankruptcy Dept  
4900 W. 95th Street  
Oak Lawn, IL 60453-0000

**Sprint Corp**  
attn: Bankruptcy Dept  
PO Box 7949  
Overland Park, KS 66207-0000

**Sprint PCS**  
PO Box 54977  
Los Angeles, CA 90017-0000

**Suntrust Bank**  
Support Services/RW 7941  
PO Box 85052  
Richmond, VA 23286-0000

**Town and Country Apts**  
1402-D Barriedale Road  
Richmond, VA 23225-0000

**VCU Health System -- MCV Hosp.**  
Set-off Debt Section  
PO Box 980462  
Richmond, VA 23298-0462

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re:

Lolita Cheatham

Debtor(s)

Case No. 16-31848-KLP  
Chapter 13

**MOTION TO EXTEND AUTOMATIC STAY**

**COMES NOW** the Debtor(s), by counsel, and offer the following Memorandum in Support of Debtor(s)' Motion to Extend Automatic Stay:

**JURISDICTION**

1. Jurisdiction of this Court over the instant matter is based upon 28 U.S.C. §1334 and 157 in that this action arises in and relates to the bankruptcy case of the Debtor(s).
2. This proceeding is a core proceeding under 28 U.S.C. §157(b)(2)(A), (B), (K), and (O).
3. Venue is proper pursuant to 28 U.S.C. §1409.

**BACKGROUND FACTS**

4. On **April 13, 2016** (hereinafter the "Petition Date") , the Debtor(s) filed in this Honorable Court a petition for relief under Chapter 13 of the Bankruptcy Code, 11 U.S.C. § 1301 et seq. (the "instant case").
5. Suzanne Wade was appointed to serve as Chapter 13 trustee in this case (the "Trustee").
6. Within the year prior to filing the instant case, Debtor(s) have been Debtor(s) in one (1) pending Chapter 13 bankruptcy case (the "previous case"), which was filed on 10/24/2014 and dismissed on 11/2/2015 (Case No. 14-35714).

7. The previous case was dismissed by the court for failure to make plan payments and an inability to cure the default.

**FACTS OF THE INSTANT CASE**

8. Discussion and argument regarding the current case will be contained in the Memorandum, which will be filed at a later date.

WHEREFORE, the Debtor respectfully requests this Honorable Court to enter an Order extending the automatic stay as to all creditors, as to Debtor(s) and Debtor(s)' property, and as to the property of the estate for the duration of the instant case, and for such other and further relief as to the Court shall be deemed appropriate.

Respectfully submitted,  
Lolita Cheatham

By: /s/ Richard J. Oulton  
Richard J. Oulton

America Law Group, Inc.  
8501 Mayland Dr., Suite 106  
Henrico, VA 23294  
Phone: 804-308-0051  
Fax: 804-308-0053

**CERTIFICATE OF SERVICE**

I certify that on April 25, 2016, a copy of this Motion to Extend the Automatic Stay was mailed via first-class mail, postage full pre-paid, to Suzanne Wade, Chapter 13 Trustee, P.O. Box 1780 Richmond, VA 23219-1780, the United States Trustee, 701 E. Broad Street, Suite 4304, Richmond, VA 23219 and all creditors as set forth on the attached mailing matrix.

/s/ Richard J. Oulton  
Richard J. Oulton, Esquire  
Counsel for Debtor(s)

*Creditors*

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